



J. IANDOLO LAW

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May 28, 2019

VIA ECF

The Honorable Richard M. Berman
United States District Judge,
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Owens, et al., 18 Cr. 693 (RMB)

Dear Judge Berman:

We represent the defendant, Attorney Ramses Owens, in the above-referenced matter and write in advance of the status conference scheduled for May 29, 2019, at noon. It is known to the Court that Attorney Ramses Owens is absent from these proceedings because of a judicial order issued by a judge in the Republic of Panama preventing his departure.

Recently, it has been brought to our attention by Attorney Marcela Arauz Quintero, defense counsel for Attorney Ramses Owens in the Republic of Panama, that the U.S. Attorney's Office for the Southern District of New York via the U.S. - Panama Mutual Assistance in Criminal Matters Treaty, has unlawfully obtained data and communication records of the personal mobile phone of Attorney Ramses Owens, while they were fully aware Attorney Ramses Owens was represented by the undersigned counsels. It is important



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to note that Attorney Ramses Owens was forced to comply with the request of the U.S. Attorney's Office for Southern District of New York under the threat of arrest by the Panamanian Authorities. Despite the fact that the United States Attorney's Office for the Southern District of New York knew Attorney Ramses Owens was represented, defense counsels for Attorney Ramses Owens, did not receive any notice from the U.S. Attorney's Office for the Southern District of New York of their attempt to obtain personal information from our client.

In addition, upon a request made by U.S. Attorney's Office for the Southern District of New York, the bank accounts of Revack Holdings Foundation held in Credicorp Bank were seized by the Public Ministry of the Republic of Panama on or about the week of March 25 to March 29 of 2019. Under the circumstances, the Public Ministry of the Republic of Panama is acting as the agent of the U.S. Attorney's Office for the Southern District of New York.

To this end, the undersigned counsels were not provided with an order and/or correspondence from this Court ordering a valid search of Attorney Ramses Owens' personal property, including but not limited to his cellular phone. As such, the United States Attorney's Office for the Southern District of New York is utilizing the Panamanian authorities to circumvent the law, a direct contradiction to the basic four principles of our judicial system; equal justice under the law, due process of law, the adversary system of justice, and the presumption of innocence unless proven guilty.



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In sum, if the United States Government wants to prosecute in the United States, they must adhere to the laws and rules of the United States legal system and not cherry pick the laws that are convenient to prosecute.

Notwithstanding Attorney Ramses Owens' absence, we respectfully request that the Court permit his counsels to appear and participate in the status conference previously mentioned supra. The filing of this letter with the Court shall NOT waive any jurisdictional defenses, of which Attorney Ramses Owens may elect to raise in his defense in the future.

Respectfully submitted,

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